

Steven Rizzo, OSB No. 840853
Mary D. Skjelset, OSB No. 075840
Rizzo Mattingly Bosworth PC
1300 SW Sixth Avenue, Ste. 330
Portland, OR 97201
Tel: (503) 229-1819
Fax: (503) 229-0630
srizzo@rizzopc.com
mskjelest@rizzopc.com

ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

J.M., et al.,

Plaintiffs,

v.

KARLA MAJOR, et. al.,

Defendants.

CASE NO. 6:18- CV-00739 - YY

**PLAINTIFFS' RESPONSE TO THE
MARION COUNTY DISTRICT
ATTORNEY'S MOTION TO QUASH**

(Oral argument requested)

INTRODUCTION

In response to the Marion County District Attorney's ("MCDA") Motion to Quash (ECF 117), Plaintiffs incorporate by reference their Motion to Compel the MCDA and their Reply to the MCDA's Response, their Motion to Compel to the Marion County Jail ("MCJ") and their Reply to the MCJ's Response, and their Response to the MCJ's Motion to Quash, along with all supporting Declarations and exhibits.

///

///

///

CONCLUSION

For the reasons set forth in the above Motions, Responses and Replies, the Court should deny the MCDA's Motion to Quash and award terms.

Dated: November 15, 2019.

RIZZO MATTINGLY BOSWORTH PC

By: /s/Steven Rizzo
Steven Rizzo, OSB No. 840853
Mary D. Skjelset, OSB No. 075840
Rizzo Mattingly Bosworth PC
1300 SW Sixth Avenue, Suite 330
Portland, OR 97201
Tel: (503) 229-1819
Fax: (503) 229-0630
ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

J.M., *et. al.*,

Plaintiff(s),

v.

KARLA MAJOR, *et. al.*,

Defendant(s).

CASE NO. 6:18-CV-00739-YY

CERTIFICATE OF SERVICE

I am employed by the law firm of Rizzo Mattingly Bosworth PC in Portland, Oregon. I am over the age of eighteen years and not a party to the subject cause. My business address is 1300 SW Sixth Avenue, Suite 330, Portland, OR 97201.

On November 15, 2019, I caused to be served on all parties in this action by transmitting a true copy thereof **PLAINTIFFS' RESPONSE TO THE MARION COUNTY DISTRICT ATTORNEY'S MOTION TO QUASH** in the following manner unless otherwise indicated.

VIA ECF

James S. Smith
Senior Assistant Attorney General
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
james.s.smith@doj.state.or.us
Of Attorneys for State Defendants

Elleanor Chin
Senior Assistant Attorney General
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
elleanor.chin@doj.state.or.us
Of Attorneys for State Defendants

Jill Schneider
Senior Assistant Attorney General
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
jill.schneider@doj.state.or.us
Of Attorneys for State Defendants

Bruce Armstrong
Marion County Counsel
555 Court St. NE, Ste. 5242
Salem, OR 97301
Telephone: (503) 588-5220
Fax: (503) 373-4367
barmstrong@co.marion.or.us
Of Attorneys for Marion County District Attorney's Office

Dated this 15th day of November, 2019.

s/Heather Wettlaufer
Heather Wettlaufer, Paralegal